

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	
	§	

DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman and moves the Court to modify condition 7(b) of his conditions of release. In support thereof, he offers the following:

I.

Upon conferring with Pretrial Services Officer Shaw, it was learned that Mr. Cooperman’s efforts to provide verification of his employment do not technically satisfy the condition 7(b) as he does not receive weekly or bi-weekly pay stubs. Officer Shaw asked that Counsel request the Court modify this condition to ensure the employment records that Mr. Cooperman can provide Pretrial are sufficient to satisfy the intent of this condition.¹

II.

As the Court is aware, Mr. Cooperman is an internationally recognized musician. Mr. Cooperman remains motivated to continue working in this role that provides for the highest and best use of his time - the role with the greatest income, so that he can support

¹ Please see Exhibit A – examples of Mr. Cooperman’s employment records.

himself, his dependents, and his defense. He receives the bookings for his performances and the resulting direct deposits from those performances. He does not receive weekly or bi-weekly checks or pay stubs.

WHEREFORE PREMISES CONSIDERED, Mr. Cooperman prays that this Honorable Court modify his conditions of pre-trial release and in order to prove that he is maintaining verifiable employment, he is allowed to provide Pretrial Services the bookings and direct deposits from his performances.

Respectfully Submitted,

/s/ Chip Lewis
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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Officer Shaw and AUSA Carter regarding this Motion and they are UNOPPOSED.

_____/s/Chip Lewis
CHIP LEWIS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been forward via electronic mail to Officer Shaw and the government.

_____/s/ Chip Lewis
CHIP LEWIS